

Dawn M. Bronson
1275 Fairhills Drive
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January 26, 2023

Hon. Judge Kenneth M. Karas
United States District Court
300 Quarropas Street
533 White Plains, NY 10601-4150

MEMO ENDORSED

Re: SEC v. Edward Bronson, et al., 12-cv-06421 (KMK) – Removal of Account Restraint

Dear Judge Karas:

I write again on behalf of my husband, Edward Bronson, who has instructed me to inform the Court as follows and make the following request.


Edward Bronson consents to Mr. Burstein's request to withdraw from his and his firm's representation of him. Scheduling and logistics are preventing incoming counsel from filing an appearance, but my husband and I continue to work through outstanding issues to resolve them. Additionally, my husband is an attorney and is comfortable acting pro se. In addition, however, it is also Mr. Burstein can no longer act to work together in my husband's defense. As such, my husband seeks no need for further briefing on Mr. Burstein's withdrawal and asks that the Court issue an order granting Mr. Burstein's withdrawal from the case.

In addition, my husband asks the Court to schedule a conference to address settlement of this action, hopefully by the end of next week or as soon as the Court can schedule one. On February 16, 2023, my husband will have been incarcerated for one year. He wants very much to be released, be with his family, begin working and to begin paying the government in good faith. Settlement discussions took place with the government's counsel but, in all frankness and as a threshold matter, the government is concerned that we have not been forthright in disclosing all our assets. While we believe we have, we believe with the Court's assistance, we can set a framework for whatever further disclosure the government believes is necessary and the parameters of further disgorgement after my husband is hopefully released. My husband truly believes that with the Court's assistance, we can bridge this credibility gap provide the government the proof it needs and move toward making further payment.

Again your Honor, my husband is approaching his one-year anniversary of imprisonment and wants only to provide the government what it needs to be satisfied that we have been fully transparent, and to then begin repayment. A settlement conference before Your Honor would be a big step in that direction. As such, Edward Bronson requests a conference as early as next week, or at the Court's earliest convenience.

The SEC is to respond to this letter by February 3, 2023. Mr. Burstein may submit an order to be relived as counsel for the Court's approval.

Thank you very much,



Dawn M. Bronson

SO ORDERED



1/27/2023